



United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

October 24, 2018

**BY ECF**

The Honorable Lewis A. Kaplan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Andreea Dumitru, S1 18 Cr. 243 (LAK)***

Dear Judge Kaplan:

The Government respectfully requests that the Court enter the enclosed proposed protective order regarding materials provided to the defendant pursuant to 18 U.S.C. § 3500 (“3500 Material”).

The proposed order limits the dissemination of 3500 Material to defense counsel and the defendant and further provides that the defendant cannot possess the 3500 Material for non-law enforcement witnesses unless he reviews the material in the presence of counsel. The Government respectfully submit that the proposed order is necessary in order to protect the safety and privacy of Government witnesses. The Government has conferred with defense counsel, who consent to the entry of the proposed order.

Respectfully submitted,

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